

# United States District Court

**SOUTHERN**

**DISTRICT OF**

**TEXAS**

**McALLEN DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**Alfredo Medina-Borja**

*Principal*

**YOB: 1988**

**Mexico**

United States District Court  
Southern District of Texas  
**FILED**

**CRIMINAL COMPLAINT**

**FEB 25 2019**

**Clerk of Court**

**Case Number:**  
**M-19-0463 -M**

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 23, 2019 in Starr County, in the Southern District of Texas defendants(s) did,

(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Brenda Guadarrama-Rogel and Alejandro Said Andrews-Miranda, both citizens and nationals of Mexico, for a total of two (2) who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport, by foot, said aliens in furtherance of such violation of law within the United States, that is, from a location near La Grulla, Texas to the point of arrest near La Grulla, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) **FELONY**

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On February 23, 2019, a Border Patrol Agent discovered foot sign near La Grulla, Texas. Agents responded to search and assist in tracking the foot sign. An agent then discovered six subjects hiding in a brushy area. The subjects, upon being discovered, all fled. The agent was able to apprehend two subjects after a short foot pursuit. A third subject was also apprehend after a secondary search. The agent recognized the third subject as a foot guide, later identified as Alfredo Medina-Borja, from a previous encounter. All the subjects were found to be illegally present in the United States.

All the subjects were transported to the McAllen Central Processing Center for processing.

**SEE ATTACHED:**

Continued on the attached sheet and made a part of this complaint: ☒ Yes ☐ No

Approved by Amy L Greenbaum  
Amy Greenbaum

Signature of Complainant

Jon M. Chan Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

February 25, 2019  
Date

at McAllen, Texas  
City and State

J Scott Hacker, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-19-0453 -M**

**RE: Alfredo Medina-Borja**  
**CONTINUATION:**

**Principal Statement**

Alfredo Medina-Borja was read his Miranda Rights. He understood his rights and declined to provide a sworn statement.

**Material Witnesses Statement**

Brenda Guadarrama-Rogel and Alejandro Said Andrews-Miranda were read their Miranda Rights. Both understood their rights and each provided a sworn statement.

Guadarrama claimed she traveled to Diaz Ordaz, Tamaulipas, Mexico where she found an alien smuggler. Guadarrama stated that she was given directions to a house where she waited until being taken to the river. Guadarrama claimed that she was then crossed on a raft into the United States. According to Guadarrama, she crossed with four other people, a foot guide, and a rafter. Guadarrama, claimed the foot guide told them to duck down when a helicopter was flying over them. Guadarrama also recalled the guide telling everyone that if they got caught or the helicopter was searching for them he would leave them. Guadarrama claimed that she paid about \$1,500 (USD) and was traveling to McAllen, Texas.

Guadarrama identified Medina, through a photo lineup, as the foot guide for the group.

Andrews stated he traveled to Diaz Ordaz, Tamaulipas, Mexico with his wife. Andrews claimed he asked around and found an alien smuggler. Andrews claimed they waited at a house until they were taken to the river. Before crossing, the foot guide told them they needed to wear long sleeve shirts and had to stay close together. Andrews was crossed on a raft with his wife, three other people, a guide and rafter into the United States. Andrews stated he paid \$1,500 (USD) and had to pay an additional \$500 (USD) when he arrived to a house in McAllen, Texas. Andrews claimed the guide would brush out any foot sign left on the roads with his t-shirt. According to Andrews, when a helicopter flew over the guide left and returned after the helicopter left. Andrews claimed the guide told them if they get caught he would leave them stranded. Andrews stated they continued making their way until the guide told them to duck down because there were cameras. Immediately after, they were found and arrested by Border Patrol.

Andrews identified Medina, through a photo lineup, as the foot guide for the group.